



Transcript of **Zachary Diggs**

Friday, September 10, 2021

David Graham Goodman v. Kenneth W. Stolle, et al.

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1 to do at that point was up to him. But he refused to
2 do anything and just laid on the ground. He may have
3 said, I'm not going to go or I'm not going to get up.
4 I don't remember his specific statement.

5 So eventually we had to move him from this
6 hallway, he can't stay in the hallway until he's
7 ready to go home, and move him to his new location.
8 So that's why we had to physically move him to the
9 new housing.

10 Q. Who gave him directions to stand up?

11 A. I don't remember that, ma'am.

12 Q. And was he told to stand up so he can
13 either get back in the wheelchair or walk?

14 MR. ROSEN: Objection. Asked and
15 answered. You can answer.

16 THE WITNESS: Yes, ma'am.

17 BY MS. ANDREWS:

18 Q. You said eventually you have to move him.
19 So how did you move him?

20 A. So I believe Repass was on one side, I was
21 on the other. And then just kind of grabbed him by
22 his wrist, forearm, underneath his armpit, just

1 physically started dragging him down the hallway.

2 Q. Did you lift him up from where he was on
3 the ground?

4 A. Slightly, yes. Yeah, I would have to.

5 Q. I may have misheard you. Did you say
6 slightly?

7 A. Yes, ma'am. I would have to have
8 physically picked him up off the ground, elevated
9 part of his body off the ground to move him down the
10 hallway, yes.

11 Q. So was Mr. Goodman upright when you and
12 Deputy Repass moved him down the hallway?

13 A. Like upright as in standing straight up
14 and down, or just --

15 Q. Yeah, was he --

16 A. His body would have been -- he was laid on
17 his back on the ground, and he would have -- his
18 torso would have been lifted up, his legs would have
19 still been on the ground, and then we were physically
20 moving him down the hallway like that.

21 Q. So he was on his back with his torso
22 lifted, and that's the position he was in when you